

DOCKET NO: UWY-CV-18-6046436-S : SUPERIOR COURT  
ERICA LAFFERTY, ET AL., :  
VS. :  
ALEX EMRIC JONES, ET AL. : FEBRUARY 10, 2022

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DOCKET NO: UWY-CV-18-6046437-S : SUPERIOR COURT  
WILLIAM SHERLACH, :  
VS. :  
ALEX EMRIC JONES, ET AL. : FEBRUARY 10, 2022

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DOCKET NO: UWY-CV-18-6046438-S : SUPERIOR COURT  
WILLIAM SHERLACH, ET AL., :  
VS. :  
ALEX EMRIC JONES, ET AL. : FEBRUARY 10, 2022

**DEFENDANTS' OBJECTIONS TO REQUEST FOR PRODUCTION OF DOCUMENTS**

**ATTACHED TO DEPOSITION NOTICE TO ALEX E. JONES**

Defendants Alex Jones, Infowars, LLC, Infowars Health, LLC, Free Speech Systems, LLC, and Prison Planet TV, LLC hereby objections to the requests for production annexed to the deposition notice to Alex E. Jones. All objections are preserved to the extent necessary for appeal.

**General Objection**

Defendants hereby object generally to each and every request for production as being untimely. Practice Book § 13-27(g) states:

The notice to a party deponent may be accompanied by a request made in compliance with Sections 13-9 through 13-11 for the production of documents and tangible things at the taking of the deposition. The procedure of Sections 13-9 through 13-11 shall apply to the request.

The parties were required to propound written discovery on each other by May 17, 2021. *See Lafferty* Entry No. 320.00. Plaintiffs cannot achieve through a deposition notice what they are not otherwise permitted to do under the scheduling order.

Notably, Plaintiffs' request for production is disingenuous. Plaintiffs have propounded multiple iterations of their notices of depositions. *See Exhibits A, B, and C*. None of them contained document requests. Apparently, Plaintiffs believe that they can attempt to abuse the discovery process to create a scenario where Mr. Jones cannot possibly comply, and then they obtain further sanctions notwithstanding any good faith efforts made. Simply put, Plaintiffs do not need the discovery requested in order to move forward to trial—its sole purpose is to oppress and burden Defendants.

**Specific Objections to Requests for Production to Alex E. Jones**

1. Any and all non-privileged documents and communications concerning any investigation, inquiry, examination, and/or research conducted by you or any agent acting on your behalf into the facts and circumstances of the Sandy Hook Shooting.<sup>1</sup>

**RESPONSE: Objection. This request is irrelevant to any determination of damages and is needlessly cumulative of prior requests for any documents related to the shooting, including, but not limited to, Plaintiffs' Request No. 1 from their First Set of Special Interrogatories and Requests for Production served January 24, 2019 ("First Set").**

2. Any and all non-privileged communications to or from Wolfgang Halbig, including letters, memoranda, emails, text messages, sms messages, instant messages sent and/or received over any social media platform, or other electronic communications;

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<sup>1</sup> Consistent with the plaintiffs' prior requests for production and the Court's ruling, the term "Sandy Hook Shooting" is defined as the shooting that took place at Sandy Hook Elementary School in the town of Newtown, Connecticut on December 14, 2012.

**RESPONSE: Objection.** This request is irrelevant to any determination of damages and is needlessly cumulative of prior requests for any documents related to the shooting and for any communications with Mr. Halbig, including, but not limited to Plaintiffs' Request Nos. 1 & 2 from their First Set.

3. Any and all non-privileged communications to or from Daniel Bidondi, including letters, memoranda, emails, text messages, sms messages, instant messages sent and/or received over any social media platform, or other electronic communications;

**RESPONSE: Objection.** This request is irrelevant to any determination of damages and is needlessly cumulative of prior requests for any documents related to the shooting, including, but not limited to, Plaintiffs' Request No. 1 from their First Set. Plaintiffs otherwise took discovery from Mr. Bidondi and had a full and fair opportunity to obtain any relevant counterparts from him. Communications with Mr. Bidondi in general have nothing to do with any aspect of this case, save for those related to Sandy Hook.

4. Any and all non-privileged communications to or from Joseph Rogan, including letters, memoranda, emails, text messages, sms messages, instant messages sent and/or received over any social media platform, or other electronic communications, concerning the Sandy Hook Shooting.

**RESPONSE: Objection.** This request is irrelevant to any determination of damages and is needlessly cumulative of prior requests for any documents related to the shooting, including, but not limited to, Plaintiffs' Request No. 1 from their First Set. Communications with Mr. Rogan in general have nothing to do with any aspect of this case.

5. Any and all non-privileged communications to or from David Jones, Robert Dew, Melinda Flores, Louis Sertucche, Buckley Hamman, Michael Zimmerman and/or Owen Shroyer, including letters, memoranda, emails, text messages, sms messages, instant messages sent and/or received

over any social media platform, or other electronic communications concerning any of the lawsuits currently pending in the State Connecticut captioned as Erica Lafferty, et al v. Alex Jones, et al, Dkt. No. UWY-CV18-6046436-S; William Sherlach v. Alex Jones, et al, Dkt. No. UWY-CV18-6046437-S, and William Sherlach, et al v. Jones, et al, UWY-CV18-6046438-S.

**RESPONSE: Objection. This request is irrelevant to any determination of damages and is needlessly cumulative of prior requests for any documents related to the shooting, including, but not limited to, Plaintiffs' Request No. 1(m) from their First Set.**

6. Any and all contracts, memoranda of understanding, agreements, certificates of debt, and/or notes concerning the relationship between and of the following entities: Free Speech Systems, LLC; [REDACTED], LLC; [REDACTED], LLC; [REDACTED], LLC.<sup>2</sup>

**RESPONSE: Objection. This request is irrelevant to any determination of damages nor does it have any relevance to any matter in this case.**

7. Any and all contracts, memoranda of understanding and agreements between the deponent and Youngevity International Corporation or any subsidiary thereof.

**RESPONSE: Objection. This request is irrelevant to any determination of damages nor does it have any relevance to any matter in this case.**

8. For the period November 2016 through the present, any and all transcripts of any program aired on Infowars.com, including closed captioning transcripts, in which the terms "Sandy Hook" or "Newtown" appear.

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<sup>2</sup> The identities of these entities were disclosed as Confidential Information under the Protective Order. The Court has previously sealed pleadings identifying such on this basis. Defendants will submit an unredacted version of the notice of deposition under seal should the Court so require.

**RESPONSE: Objection.** This request is irrelevant to any determination of damages and is needlessly cumulative of prior requests for any documents related to the shooting, including, but not limited to, Plaintiffs' Request No. 1 from their First Set.

9. Complete transaction histories, including, but not limited to, dates, amounts, input/output addresses, fees, and transaction numbers, from any cryptocurrency exchanges, investment firms, brokerages, and/or cryptocurrency management software, including virtual wallet software, mobile applications, desktop applications, and/or web-based systems.

**RESPONSE: Objection.** This request is irrelevant to any determination of damages nor does it have any relevance to any matter in this case. This request is otherwise premature: in the event a plaintiff obtains a judgment in this matter, they will then have the ability to serve post-judgment interrogatories.

10. Records of deposits of cryptocurrency into fiat currency, including, but not limited to, method of exchange, location of exchange, dates, amounts, and input/output addresses, transaction numbers, and fees paid.

**RESPONSE: Objection.** This request is irrelevant to any determination of damages nor does it have any relevance to any matter in this case. This request is otherwise premature: in the event a plaintiff obtains a judgment in this matter, they will then have the ability to serve post-judgment interrogatories.

Dated: February 10, 2022

Respectfully submitted,  
ALEX EMRIC JONES, INFOWARS, LLC,  
FREE SPEECH SYSTEMS, LLC,  
INFOWARS HEALTH, LLC, PRISON  
PLANET TV, LLC

By: /s/ Jay M. Wolman  
Jay M. Wolman— Juris #433791 of

Randazza Legal Group, PLLC  
100 Pearl Street, 14th Floor  
Hartford, CT 06103  
P: 702-420-2001  
F: 305-437-7662  
*Counsel for Defendants Alex E. Jones, Free  
Speech Systems, LLC, Infowars, LLC,  
Infowars Health, LLC, and Prison Planet  
TV, LLC*

And

/s/Norman A. Pattis  
Norman A. Pattis  
PATTIS & SMITH, LLC  
Juris No. 423934  
383 Orange Street  
New Haven, CT 06511  
V: 203-393-3017  
F: 203-393-9745  
npattis@pattisandsmith.com  
*Counsel for Defendants Free Speech  
Systems, LLC, Infowars, LLC, Infowars  
Health, LLC, and Prison Planet TV, LLC*  
Their Attorneys

**CERTIFICATION**

I hereby certify that a copy of the above was mailed or electronically delivered on this 10th day of February 2022 to all counsel and pro se parties of record and that written consent for electronic delivery was received from all counsel and pro se parties of record who were electronically served including:

Alinor C. Sterling  
Christopher M. Mattei  
Matthew S. Blumenthal  
KOSKOFF KOSKOFF & BIEDER  
350 Fairfield Avenue  
Bridgeport, CT 06604  
<asterling@koskoff.com>  
<cmattei@koskoff.com>  
<mblumenthal@koskoff.com>  
*Attorneys for Plaintiffs*

Mario Cerame, Esq.  
Brignole, Bush & Lewis  
73 Wadsworth Street  
Hartford, CT 06106  
<mcerame@brignole.com>  
*Attorneys for Defendant  
Genesis Communications Network, Inc.*

Eric Henzy  
Zesler & Zeisler, P.C.  
10 Middle Street, 15<sup>th</sup> Floor  
Bridgeport, CT 06605  
<ehenzy@zeislaw.com>  
*Attorney for Plaintiff Richard M. Coan, Trustee  
of the Bankruptcy Estate of Erica Garbatini  
a/k/a Erica Lafferty*

/s/ Jay M. Woman 433791  
Jay M. Wolman

# **Exhibit A**



NO. X06-UWY-CV-18-6046436S : SUPERIOR COURT  
ERICA LAFFERTY, ET AL. : COMPLEX LITIGATION DOCKET  
V. : AT WATERBURY  
ALEX EMRIC JONES, ET AL. : JUNE 8, 2021

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NO. X-06- UWY-CV18-6046437-S : SUPERIOR COURT  
WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET  
V. : AT WATERBURY  
ALEX EMRIC JONES, ET AL. : JUNE 8, 2021

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NO. X06-UWY-CV-18-6046438S : SUPERIOR COURT  
WILLIAM SHERLACH, ET AL. : COMPLEX LITIGATION DOCKET  
V. : AT WATERBURY  
ALEX EMRIC JONES, ET AL. : JUNE 8, 2021

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**NOTICE OF VIDEOTAPED DEPOSITION**

**PLEASE TAKE NOTICE** that the Plaintiffs in the above-captioned matter will take the videotaped deposition of **ALEX EMRIC JONES** on **Monday, September 13, 2021 at 10:00 a.m. Eastern Time (9:00 a.m. Central Time)**, to be held at the offices of U.S. Legal Support, Omni Austin Hotel Downtown, 701 Brazos Street, #380, Austin, TX 78701 or otherwise **via remote videoconferenece**, before a notary public or other competent authority.

**THE PLAINTIFFS,**

**By     /s/ ALINOR C. STERLING**  
**ALINOR C. STERLING**  
**CHRISTOPHER M. MATTEI**  
**MATTHEW S. BLUMENTHAL**  
KOSKOFF KOSKOFF & BIEDER, PC  
350 FAIRFIELD AVENUE  
BRIDGEPORT, CT 06604  
JURIS #32250  
TEL: (203) 336-4421  
FAX: (203) 368-3244  
[asterling@koskoff.com](mailto:asterling@koskoff.com)  
[cmattei@koskoff.com](mailto:cmattei@koskoff.com)  
[mblumenthal@koskoff.com](mailto:mblumenthal@koskoff.com)

## **CERTIFICATION**

This is to certify that a copy of the foregoing has been emailed and/or mailed, this day, postage prepaid, to all counsel and *pro se* appearances as follows:

***For Alex Emric Jones, Infowars, LLC, Free Speech Systems, LLC, Infowars Health, LLC and Prison Planet TV, LLC:***

Jay Marshall Wolman, Esq.  
100 Pearl Street, 14th Floor  
Hartford, CT 06103  
[jmw@randazza.com](mailto:jmw@randazza.com)  
P: 702-420-2001

***For Genesis Communications Network, Inc.:***

Mario Kenneth Cerame, Esq.  
Brignole & Bush LLC  
73 Wadsworth Street  
Hartford, CT 06106  
[mario@brignole.com](mailto:mario@brignole.com)  
[mcerame@brignole.com](mailto:mcerame@brignole.com)  
P: 860-527-9973

and via email to:

US Legal Support  
[sweissman@uslegalsupport.com](mailto:sweissman@uslegalsupport.com)  
[azampella@uslegalsupport.com](mailto:azampella@uslegalsupport.com)  
[hwade@uslegalsupport.com](mailto:hwade@uslegalsupport.com)

\_\_\_\_\_  
/s/ Alinor C. Sterling  
ALINOR C. STERLING  
CHRISTOPHER M. MATTEI  
MATTHEW S. BLUMENTHAL

# **Exhibit B**

NO. X06-UWY-CV-18-6046436-S : SUPERIOR COURT  
ERICA LAFFERTY, ET AL. : COMPLEX LITIGATION DOCKET  
V. : AT WATERBURY  
ALEX EMRIC JONES, ET AL. : NOVEMBER 11, 2021

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NO. X06-UWY-CV-18-6046437-S : SUPERIOR COURT  
WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET  
V. : AT WATERBURY  
ALEX EMRIC JONES, ET AL. : NOVEMBER 11, 2021

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NO. X06-UWY-CV-18-6046438-S : SUPERIOR COURT  
WILLIAM SHERLACH, ET AL. : COMPLEX LITIGATION DOCKET  
V. : AT WATERBURY  
ALEX EMRIC JONES, ET AL. : NOVEMBER 11, 2021

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**NOTICE OF VIDEOTAPED DEPOSITION**

PLEASE TAKE NOTICE that the Plaintiffs in the above-captioned matter will take the videotaped deposition of ALEX EMRIC JONES on Tuesday, December 14, 2021 at 10:00 a.m. Eastern Time (9:00 a.m. Central Time) AND Wednesday, December 15, 2021 at 10:00am EST (9:00 a.m. Central Time), to be held at the offices of U.S. Legal Support, 701 Brazos Street, #380, Austin, TX 78701 or otherwise **via remote videoconference**, before a notary public or other competent authority.

**THE PLAINTIFFS,**

**By** /s/ Christopher M. Mattei, Esq.  
**CHRISTOPHER M. MATTEI**  
**ALINOR C. STERLING**  
**MATTHEW S. BLUMENTHAL**  
**SARAH STEINFELD**  
KOSKOFF KOSKOFF & BIEDER  
350 FAIRFIELD AVENUE  
BRIDGEPORT, CT 06604  
[cmattei@koskoff.com](mailto:cmattei@koskoff.com)  
[asterling@koskoff.com](mailto:asterling@koskoff.com)  
[mblumenthal@koskoff.com](mailto:mblumenthal@koskoff.com)  
[ssteinfeld@koskoff.com](mailto:ssteinfeld@koskoff.com)  
Telephone: (203) 336-4421  
Fax: (203) 368-3244  
JURIS #32250

## **CERTIFICATION**

This is to certify that a copy of the foregoing has been emailed and/or mailed, this day, postage prepaid, to all counsel and *pro se* appearances as follows:

***For Alex Emric Jones, Infowars, LLC, Free Speech Systems, LLC, Infowars Health, LLC and Prison Planet TV, LLC:***

Jay Marshall Wolman, Esq.  
100 Pearl Street, 14th Floor  
Hartford, CT 06103  
[jmw@randazza.com](mailto:jmw@randazza.com)  
P: 702-420-2001

Norman A. Pattis, Esq.  
Kevin Smith, Esq.  
Pattis & Smith, LLC  
383 Orange Street, First Floor  
New Haven, CT 06511  
P: 203-393-3017  
[npattis@pattisandsmith.com](mailto:npattis@pattisandsmith.com)

***For Genesis Communications Network, Inc.***

Mario Kenneth Cerame, Esq. (via USPS)  
Brignole & Bush LLC  
73 Wadsworth Street  
Hartford, CT 06106  
P: 860-527-9973

**U.S. Legal Support** (via email)  
[acedeno@uslegalsupport.com](mailto:acedeno@uslegalsupport.com)  
[dshivprasad@uslegalsupport.com](mailto:dshivprasad@uslegalsupport.com)

*/s/ Christopher M. Mattei, Esq.*  
**CHRISTOPHER M. MATTEI**  
**ALINOR C. STERLING**  
**MATTHEW S. BLUMENTHAL**  
**SARAH STEINFELD**

# **Exhibit C**



**NO. X06-UWY-CV-18-6046436-S : SUPERIOR COURT**  
**ERICA LAFFERTY, ET AL. : COMPLEX LITIGATION DOCKET**  
**V. : AT WATERBURY**  
**ALEX EMRIC JONES, ET AL. : JANUARY 31, 2022**

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**NO. X06-UWY-CV-18-6046437-S : SUPERIOR COURT**  
**WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET**  
**V. : AT WATERBURY**  
**ALEX EMRIC JONES, ET AL. : JANUARY 31, 2022**

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**NO. X06-UWY-CV-18-6046438-S : SUPERIOR COURT**  
**WILLIAM SHERLACH, ET AL. : COMPLEX LITIGATION DOCKET**  
**V. : AT WATERBURY**  
**ALEX EMRIC JONES, ET AL. : JANUARY 31, 2022**

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**RE-NOTICE OF VIDEOTAPED DEPOSITION**

**PLEASE TAKE NOTICE** that the Plaintiffs in the above-captioned matter will take the videotaped deposition of **ALEX EMRIC JONES** on **Wednesday, February 23, 2022 at 10:00 a.m. Eastern Time (9:00 a.m. Central Time)** and continuing to **Thursday, February 24, 2022** and until such deposition is complete, to be held in the Tesla Fiber Room at the offices of fibercove, 1700 South Lamar Boulevard, Suite 338, Austin, TX 78704, or otherwise **via remote videoconference**, before a notary public or other competent authority. The Plaintiffs also request that **ALEX EMRIC JONES** produce the items, documents, and information described in the Schedule A attached hereto.

**THE PLAINTIFFS,**

**By** /s/ Christopher M. Mattei, Esq.  
**CHRISTOPHER M. MATTEI**  
**ALINOR C. STERLING**  
**MATTHEW S. BLUMENTHAL**  
**SARAH STEINFELD**  
KOSKOFF KOSKOFF & BIEDER  
350 FAIRFIELD AVENUE  
BRIDGEPORT, CT 06604  
[cmattei@koskoff.com](mailto:cmattei@koskoff.com)  
[asterling@koskoff.com](mailto:asterling@koskoff.com)  
[mblumenthal@koskoff.com](mailto:mblumenthal@koskoff.com)  
[ssteinfeld@koskoff.com](mailto:ssteinfeld@koskoff.com)  
Telephone: (203) 336-4421  
Fax: (203) 368-3244  
JURIS #32250

## **CERTIFICATION**

This is to certify that a copy of the foregoing has been emailed and/or mailed, upon service of the deponent, to all counsel and *pro se* appearances as follows:

***For Alex Emric Jones, Infowars, LLC, Free Speech Systems, LLC, Infowars Health, LLC and Prison Planet TV, LLC:***

Jay Marshall Wolman, Esq.  
100 Pearl Street, 14th Floor  
Hartford, CT 06103  
[jmw@randazza.com](mailto:jmw@randazza.com)  
P: 702-420-2001

Norman A. Pattis, Esq.  
Kevin Smith, Esq.  
Pattis & Smith, LLC  
383 Orange Street, First Floor  
New Haven, CT 06511  
P: 203-393-3017  
[npattis@pattisandsmith.com](mailto:npattis@pattisandsmith.com)

***For Genesis Communications Network, Inc.***

Mario Kenneth Cerame, Esq.  
Brignole & Bush LLC  
73 Wadsworth Street  
Hartford, CT 06106  
P: 860-527-9973  
[mcerame@brignole.com](mailto:mcerame@brignole.com)

**U.S. Legal Support** (via email)  
[acedeno@uslegalsupport.com](mailto:acedeno@uslegalsupport.com)  
[dshivprasad@uslegalsupport.com](mailto:dshivprasad@uslegalsupport.com)

*/s/ Christopher M. Mattei, Esq.*  
**CHRISTOPHER M. MATTEI**  
**ALINOR C. STERLING**  
**MATTHEW S. BLUMENTHAL**  
**SARAH STEINFELD**

## Schedule A

### Definitions

Please be advised that these Requests for Production use and incorporate the definitions set forth in Conn. Practice Book § 13-1.

In addition, for the purposes of these Requests for Production only,

**“Sandy Hook Shooting”** is defined as: the shooting that took place at Sandy Hook Elementary School in the town of Newtown, Connecticut on December 14, 2012.

**“The plaintiffs in this lawsuit”** is defined as: Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Francine Wheeler, David Wheeler, Jennifer Hensel, Jeremy Richman, Donna Soto, Carlee Soto-Parisi, Carlos M. Soto, Jillian Soto, Erica Lafferty, William Sherlach, and Robert Parker.

**“Sandy Hook Hoax Theory”** is defined as: Any theory that the Sandy Hook Shooting did not happen as is generally accepted, including that it was a government conspiracy, scripted, included so-called “crisis actors,” that the Sandy Hook Victims did not die, and bases for such theories.

**“This Lawsuit”** is defined as: *Erica Lafferty, et al v. Alex Jones, et al*, UWY-CV18-6046436-S; *William Sherlach v. Alex Jones, et al*, UWY-CV18-6046437-S, and *William Sherlach, et al v. Jones, et al*, UWY-CV18-6046438-S.

**“The Texas Lawsuits”** is defined as: *Neil Heslin v. Alex E. Jones, et al*, Cause No. D-1-GN-18-001835; *Leonard Pozner and Veronique de la Rosa v. Alex E. Jones, et al*, Cause No. D-1-GN-18-001842; *Scarlett Lewis v. Alex E. Jones, et al*, Cause No. D-1-GN-18-006623, *Marcel Fontaine v. Alex E. Jones, et al*, Cause No. D-1-GN-18-001605; *Brennan M. Gilmore v. Alexander E. Jones, et al.*, Case No. 18-00017 (D. W.Va.).

Unless otherwise specified, the time frame for these discovery requests is **December 14, 2012 through and including February 23, 2022.**

1. Any and all non-privileged documents and communications concerning any information that the deponent relied upon and/or referenced in connection with any on-air statement he made concerning the Sandy Hook Shooting, the Sandy Hook Hoax Theory, and/or the plaintiffs in this lawsuit.

## **Schedule A**

a. Any and all non-privileged documents and communications concerning the source(s) of any such information.

2. Any and all non-privileged communications to or from Wolfgang Halbig, including letters, memoranda, emails, text messages, sms messages, instant messages sent and/or received over any social media platform, or other electronic communications;

3. Any and all non-privileged communications to or from Daniel Bidondi, including letters, memoranda, emails, text messages, sms messages, instant messages sent and/or received over any social media platform, or other electronic communications;

4. Any and all non-privileged communications to or from Joseph Rogan, including letters, memoranda, emails, text messages, sms messages, instant messages sent and/or received over any social media platform, or other electronic communications, concerning the Sandy Hook Shooting, the Sandy Hook Hoax Theory, the plaintiffs in this lawsuit, and/or any appearance by the deponent on the Joe Rogan Experience podcast.

5. Any and all non-privileged communications to or from David Jones, Robert Dew, Melinda Flores, Lydia Zapata-Hernandez, Anthony Gucciardi, Adan Salazar, Nico Acosta, Cristopher Daniels, Timothy Fruge, Blake Roddy, Louis Sertucche, Buckley Hamman, Michael Zimmerman and/or Owen Shroyer, including letters, memoranda, emails, text messages, sms messages, instant messages sent and/or received over any social media platform, or other electronic communications concerning this Lawsuit and/or the Texas Lawsuits.

6. Any and all contracts, memoranda of understanding, agreements, certificates of debt, and/or notes concerning the relationship between any of the following entities: Free Speech Systems, LLC; [REDACTED], LLC; [REDACTED], LLC; [REDACTED], LLC.

## **Schedule A**

7. Any and all contracts, memoranda of understanding and agreements between the deponent and Youngevity International Corporation or any subsidiary thereof.

8. For the period November 2016 through the present, any and all transcripts of any program aired on Infowars.com, including closed captioning transcripts, in which the terms “Sandy Hook” or “Newtown” appear.

9. Documents sufficient to identify every cellular telephone number utilized by you from December 14, 2012 through February 23, 2022.

10. Complete transaction histories, including, but not limited to, dates, amounts, input/output addresses, fees, and transaction numbers, from any cryptocurrency exchanges, investment firms, brokerages, and/or cryptocurrency management software, including virtual wallet software, mobile applications, desktop applications, and/or web-based systems.

11. Records of deposits of cryptocurrency into fiat currency, including, but not limited to, method of exchange, location of exchange, dates, amounts, and input/output addresses, transaction numbers, and fees paid.